

American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

November 16, 2004

RE: FCC ID: ATH2425111_ATCB001894

Attention: Kathy Grzovic

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. FYI - Please note that radiated spurious ERP measurements should be compared to ERP power measurements not conducted power measurements. While the end result of both is - 20dBm, the correct units and correct methods should be used.

Response: Thank you.

2. Please note that while it may be correct to use the conducted antenna terminal power for the purpose of listing on the grant, you will still need to provide EIRP power measurements to justify not performing SAR on the device. Please also note that the power level required to be met for the exclusions list would be 174MHz, not 150MHz. The exclusions list for power at 174MHz (upper end of this device operation) for devices used greater than 2.5cm is 900/174 or 5.2W. While you state that the worse case EIRP at 150MHz is 4.4W this may not be the worse case condition. As the conducted power at 174MHz is 6.3Watts and as the gain of the antenna is not specified it is possible that the EIRP value at 174MHz would be in excess of the 5.2Watts exclusions list power limit. Even a straight extrapolation from the 4.4W 150MHz measured value, assuming that antenna gain may outweigh the 50% PTT averaging at 174MHz, indicates that the device may not pass the 5.2 watts at 174MHz. Please measure the EIRP at 174MHz and justify that the 174MHz EIRP 50% PTT power is below 5.2W. Otherwise, SAR may be required for this device and it may have to be sent to the FCC for certification.

Response: Please refer to the revised RF Exposure exhibit uploaded with this response.

3. FYI - Please note that while the conducted antenna terminal power is appropriate to list on the grant, the ERP of the device should also be listed in the grant notes. Please consider providing maximum ERP power values for this device.

Response: Thank you.

4.

Dennis Ward
mailto:dward@AmericanTCB.com

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination.

Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.